

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

NOV 12 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

BILLY JOE PARRISH, JR.,

Defendant.

4:20CR722 SEP/DDN

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§ 2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. On or about January 17, 1996, the defendant **BILLY JOE PARRISH, JR.** was convicted in St. Louis County of forcible sodomy involving a minor in violation of Missouri Revised Statute, Section 566.060.

4. On or about October 14, 2017, within the Eastern District of Missouri, and elsewhere,

**BILLY JOE PARRISH, JR.,**

the defendant herein, did knowingly transport images of child pornography using any means or facility of interstate and foreign commerce or in or affecting interstate or foreign commerce by

any means, that is, the defendant transported a graphic video file using the Internet, which contained child pornography, including, but not limited to, the following:

a. “(pthc) sally full (6yo) VERY GOOD.mpg” – a graphic video that depicts, in part, a prepubescent minor female in a black shirt and red socks in a lascivious display of her genitals, while her wrists are handcuffed and her ankles bound to a green device, and a pink cylindrical object is penetrating her vagina;

In violation of Title 18, United States Code, Section 2252A(a)(1).

## **COUNT II**

The Grand Jury further charges that:

5. The allegations contained in paragraphs one through three of Count I of this Indictment are incorporate by reference as if fully set forth herein.

6. Between in or about January 1, 2017, and on or about March 1, 2018, within the Eastern District of Missouri and elsewhere,

### **BILLY JOE PARRISH, JR.,**

the defendant herein, knowingly possessed material that contained an image of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, an RCA Cambio device that was produced outside of Missouri and therefore has traveled in interstate and foreign commerce, and said device contained child pornography, including, but not limited to, the following:

a. “0F2408D1465C9EEF991E7289BE05C453F89FAD97.img” – a graphic image file that depicts a prepubescent minor female holding an erect penis while it ejaculates;

b. "11E77EB3CE7E9476DC28CEEF662CA1DA2855280D.img" - a graphic imagefile that depicts a prepubescent minor female in in a lascivious display of her genitals while he legs are bound;

c. "174C7B473514825E1A277F8996D0153108A970F8.img" - a graphic image file that depicts a minor female in a lascivious display of her genitals and using an object on her vagina;

d. "2D810FAF13BBE69EBFAFF81B1FF8A6225D510AB3.img" - a graphic image file that depicts a minor female performing oral sex on a male with her hands bound with rope above her head;

e. "38D423C3B8EE5D744D9787430FF1CAF99489A0CC.img" - a graphic image file collage that depicts a toddler female engaging in oral and anal sex; and

f. "820A52077E4F6E5E8DF3824AA2D9E6B3B3C9D368.img" - a graphic image file that depicts a female baby in a lascivious display of her genitals.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

#### FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252A as set forth in Counts I and II of the Indictment, the defendant shall forfeit to the United States of America: any visual depiction as described in Sections 2251, 2251A, 2252, 2252A or 2260 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of

Title 18; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

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